



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

9311 GROH ROAD  
GROSSE ILE, MI 48138

MAY 18 2009

**MEMORANDUM**

**SUBJECT:** ACTION MEMORANDUM: Request for a Ceiling Increase to Complete the Time-Critical Removal Action at the Norwood Industries Site, Toledo, Lucas County, Ohio (Site ID #B5PA)

**FROM:** Jon J. Gulch, On-Scene Coordinator 59  
Emergency Response Branch 1

**TO:** Richard C. Karl, Director  
Superfund Division

**THRU:** Jason H. El-Zein, Chief  
Emergency Response Branch 1

**I. PURPOSE**

The purpose of this memorandum is to request and document your approval to increase the project ceiling in order to complete the on-going time-critical removal action. The original Action Memorandum was approved by Superfund Division Director Richard Karl on September 10, 2008. A ceiling increase Action Memorandum was approved by Superfund Division Director Richard Karl on December 30, 2008. This ceiling increase is necessary to continue mitigation of threats to public health, welfare and the environment posed by the presence of uncontrolled hazardous wastes at the Norwood Industries Site (Site). The proposed project ceiling increase of \$166,980, combined with the previously approved project ceiling of \$982,983, would bring the total allowable project funding expenditure to \$1,149,964.

The response actions proposed herein are necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. The City of Toledo-Division of Environmental Services (TDES), Ohio Environmental Protection Agency (OEPA) and U.S. EPA have documented the presence of hazardous substances existing at the Site for several years, including flammable substances in drums and other containers inside Site structures, and materials leaking through the walls into the environment.

The response action proposed herein will mitigate the threats posed by the waste at the Site, by properly identifying, consolidating, packaging, removing and disposing of hazardous substances. Additional Site activities will include security, perimeter air monitoring, and decontamination of the building and surrounding Site property, as needed. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1), to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require an additional 10 working days to complete, for a total of 145 working days for the project. The ceiling increase is necessary because of the inaccessibility of a majority of site wastes, including the basement, due to poor site housekeeping; the discovery of an unknown sludge in the basement, which was previously inaccessible; additional costs due to the nature and quantity of waste; and the personnel costs associated with the aforementioned site issues.

The presence of hazardous substances at the Site has been documented, via field hazard categorization (HazCAT) and laboratory analysis, and includes: flammable liquids; corrosive liquids and solids, including several drums of organic acids; halogenated organic liquids; flammable acids; and oxidizing liquids and solids. Since beginning the time-critical removal action, hazardous wastes have been identified in approximately 1,200 drums and 1,300 small containers. In addition, several thousand small containers have been located in areas that had been previously inaccessible due to haphazard placement of drums, pallets and small containers, mixed with general debris. This includes the basement, which contains hundreds of 5-gallon buckets and 1-gallon containers, an elevator shaft with approximately 8,000 gallons of liquid, and 2 inches of an unknown sludge covering approximately 75% of the floor.

There are no nationally significant or precedent setting issues associated with the Site. The Site is not on the National Priorities List.

## **II. SITE CONDITIONS AND BACKGROUND**

1. The CERCLIS identification number for this Site is OHN 000 510 295
2. Physical Location and Description of Site

The Site is located at 1678 Norwood Street, Toledo, Lucas County, Ohio, 43607. An aerial photograph of the Site and the surrounding area is attached in Figure A-1. The Site consists of a two-story warehouse building, which was built in 1917, with a total of approximately 14,337 square feet under roof, on a lot approximately one acre in size, located in an area that is primarily residential with some commercial and industrial subdivisions. The Site is bounded on the north by an open lot and

Oakwood Avenue, to the east by Norfolk Southern railroad tracks and an open lot, to the south by Norwood Avenue and industrial properties, and to the west by Clinton Street and an unnamed tire and automotive service facility (Figure A-2)

The geographical coordinates for the Site are 41° 39' 19 north latitude and 83° 35' 0" west longitude. As of June 4, 2008, there were approximately 2,047 55-gallon drums and other containers of unknown waste in storage throughout the building. However, due to the amount of garbage and debris spread throughout the building, it is anticipated that several more drums and other containers of unknown waste will be encountered during the removal action. It is likely that some of the inaccessible, unidentifiable drums and small containers within the warehouse contain hazardous substances. The nearest homes on the west side of the lot are approximately 100 feet from the area in which the leaking drums are currently stored. The Site is not fenced on three sides or otherwise enclosed or protected, and partially secured windows and doors provide temporary restricted access to all areas of the Site.

For a more detailed description of Physical Location and Description of Site, refer to the original Action Memorandum, dated September 10, 2008 (Attachment 4).

### 3. Site Background

On June 3, 2008, U.S. EPA mobilized its Superfund Technical Assistance and Response Team (START) contractor to the Site to conduct a Site Assessment (SA). During the SA, the presence of approximately 2,047 55-gallon drums and other containers was noted. During its SA, START documented current Site conditions, inventoried all accessible drums and containers, and sampled five selected drums and containers and one solid sample of the Paracril material, which is leaking from drums into the outside environment. Analytical results of these samples indicated that two drums, ND-WL005-060408 and NL-WL006-060408, had flash point results less than 140 deg F. Sampling results identified elevated levels of listed solvents in materials on the floor (Paracril) and in two drums at the Site. Samples ND-WL001-060408, ND-WL002-060408, ND-WS001-060408, and ND-WS001-060408D (duplicate) exhibited reportable concentrations of ethylbenzene, toluene, and/or xylenes.

The amount and haphazard placement of debris and general refuse within the building limited access to all parts of the building. Narrow walkways had been cleared through the assortment of debris, drums, small containers, pallets, and general refuse, but WESTON START was unable to access all areas and unable to identify all drums and small containers. It is likely that some of the inaccessible, unidentifiable drums and small containers within the warehouse facility contain hazardous substances. In

addition, WESTON START identified hazardous substances at the Cretecote Site, through separate SA activities. Due to the fact that the business owner performs operations at both warehouse facilities, and some of the same materials were identified at both of the Sites, it is possible that hazardous substances found at the Cretecote Site could also be stored at this Site.

For a more detailed Site Background, refer to the original Action Memorandum, dated September 10, 2008, attached.

4. Removal Actions to Date

On October 16, 2008, U.S. EPA, START, and Emergency and Rapid Removal Service (ERRS) contractors mobilized to the Site and met with the property owner to perform a walk-through of the interior and exterior of the warehouse facility. Specifically, the following activities were started or have been completed:

- A. Implemented the Site Health and Safety Plan, Work Plan and Emergency Contingency Plan;
- B. Established a Command Post and Work Zones;
- C. Identified, inventoried, staged and characterized approximately 972 total items (drums and small containers);
- D. Initiated HazCAT process and have tested approximately 188 55-gallon drums and 272 small containers;
- E. Placed approximately 151 1-gallon pails into 44 55-gallon drums;
- F. Disposed of 36 pallets of solid materials (silica sand and powders) to make room for proper sampling and characterization of hazardous materials; and
- G. Staged several dozen large pieces of metal in the courtyard to allow room in the building for proper sampling and characterization of hazardous materials.

5. Justification for the Project Ceiling Increase

- A. Due to the inaccessibility of a vast majority of the building during the Site Assessment and first phases of the Removal Action, there have been several hundred additional drums and small containers with a wide variety of hazardous constituents, including: flammable liquids; corrosive liquids and solids, including several drums of organic acids; halogenated organic liquids; and oxidizing liquids and solids.

- B. Due to the placement of general debris in the area of the stairway to the basement, access was not possible during the SA and first phases of the Removal Action. In addition, the owner of the Site indicated that there were no hazardous materials and only a small number of 5-gallon pails in the basement. During the week of November 24, 2008, the general debris was cleared from the stairway and access was established to the basement. During the initial entry, it was noted that there were several hundred small containers, several dozen drums, an elevator shaft with approximately 8,000 gallons of liquid and, 2 inches of an unknown sludge covering approximately 75% of the floor.
- C. To access the drums, small containers, elevator shaft water, unknown sludge, and contaminated general debris in the basement, a structural engineer will need to be added to the project team to design a method of removal.
- D. Anticipated costs for disposal have become more expensive due to the nature and quantity of waste.
- E. Additional personnel, personnel time, per diem and lodging, and materials will be required to complete the time-critical removal action, which will increase the required project ceiling.

### **III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

The conditions present at the Norwood Industries Site present an imminent and substantial threat to the public health, welfare, and the environment, based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 C.F.R. Part 300. These factors include the following:

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:
2. Actual or potential contamination of drinking water supplies or sensitive ecosystems:
3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.
4. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released:
5. Threat of fire or explosion:
6. The availability of other appropriate federal or state response mechanisms to respond to the release.

Please refer to the original Action Memorandum dated September 10, 2008 (Attachment 4), for detailed threat information. Public health and environmental

threats, as well as contaminants of concern remain the same, only the volumes of wastes have increased.

#### **IV. ENDANGERMENT DETERMINATION**

Given the Site conditions, the nature of the known and suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

#### **V. PROPOSED ACTIONS**

1. The OSC proposes to undertake the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:
  - A. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
  - B. Develop and implement a Site Work Plan and Site Security Plan;
  - C. Inventory and perform hazard characterization, in compliance with a Site-specific Quality Assurance/Quality Control Plan, on all substances in containers, drums and tanks;
  - D. Investigate the potential for soil contamination on Site property;
  - E. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
  - F. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA-approved disposal facility, in accordance with U.S. EPA's Off-Site Rule, 40 C.F.R. § 300.440; and
  - G. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.
2. The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(I) of the NCP.

The threats posed by open and deteriorated drums and containers with substances considered hazardous are actionable under the criteria listed in Section 300.415(b)(2) of the NCP. The response actions proposed herein are consistent with any long-term remedial actions which may be required. Elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to minimize substantial requirements for post-removal Site controls.

## **VI. ESTIMATED COSTS**

The estimated costs to complete the above activities are summarized below. These activities will require an additional 10 working days to complete, for a total of 145 working days to complete the project. More detailed cleanup contractor costs are presented in Attachment 1. The Removal Project Ceiling Estimate is as follows:

### **REMOVAL PROJECT CEILING ESTIMATE**

<i>Regional Removal Allowance Costs:</i>	<i>Current:</i>	<i>Increase:</i>	<i>Total:</i>
<b>Total Cleanup Contractor Costs:</b> (This cost category includes estimates for ERRS and subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 15% contingency.)	\$709,353	\$139,151	\$848,504
<i>Other Extramural Costs Not Funded from the Regional Allowance:</i>			
<b>Total START, including multiplier costs:</b>	\$109,800	\$0	\$109,800
<b>Total USCG Strike Team:</b>	\$0	\$0	\$0
<b>Extramural Subtotal:</b>	\$819,153	\$	\$958,304
<b>Extramural Contingency (20%)</b>	\$163,830	\$27,830	\$191,660
<b>TOTAL REMOVAL PROJECT CEILING:</b>	\$982,983	\$166,980	\$1,149,964

### **Applicable or Relevant and Appropriate Requirements**

All applicable and relevant and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable. A letter dated July 21, 2008, was sent to Colleen Weaver, OEPA, Northwest District Office, requesting notification for any applicable state ARARs. To the extent practicable, U.S. EPA will comply with the ARARs identified in a timely manner. In addition, transport and dispose of all characterized or identified hazardous substances,

pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA-approved disposal facility, in accordance with U.S. EPA's Off-Site Rule, 40 C.F.R. § 300.440.

**VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Delayed or no action will result in increased potential of the toxic and hazardous substances to release, thereby threatening the environment and the health and welfare of nearby residents and other persons who are in proximity to the Site.

**VIII. OUTSTANDING POLICY ISSUES**

None

**IX. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,955,806.<sup>1</sup>

$$(\$1,149,964 + \$50,580) + (62.91\% \times \$1,200,544) = \$1,955,806$$

**X. RECOMMENDATION**

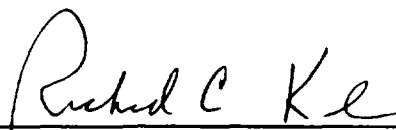
This decision document represents the selected removal action for the Norwood Industries Site located in Toledo, Lucas County, Ohio. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, which is summarized in Attachment II. Conditions at the Site meet the NCP § 300.415(b)(2) criteria for a time-critical removal action and I recommend your approval of the proposed ceiling increase of \$166,980, of this an estimated \$166,980 may be used for the cleanup contractor costs. The total removal project ceiling, if approved, will be \$1,149,964. You may indicate your decision by signing below.

---

<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.



APPROVE:



DATE: 5.18.09

Richard C. Karl  
Director, Superfund Division

DISAPPROVE:

DATE: \_\_\_\_\_

Richard C. Karl  
Director, Superfund Division

#### Enforcement Addendum

#### Figures:

- A-1 Site Location Map
- A-2 Site Features Map

#### Attachments:

1. Detailed Cleanup Contractor Cost Estimate
2. Administrative Record Index
3. Independent Government Cost Estimate
4. Original Action Memorandum dated September 10, 2008
5. Ceiling Increase Action Memorandum dated December 30, 2008

cc: David Chung, U.S. EPA HQ, 5203-G  
Michael Chezik, U.S. DOI, **w/o Enf. Addendum**  
Kevin Clouse, OEPA, **w/o Enf. Addendum**  
Richard Cordray, Ohio Department of Attorney General, **w/o Enf. Addendum**

**ENFORCEMENT ADDENDUM**

**NORWOOD INDUSTRIES SITE  
TOLEDO, LUCAS COUNTY, OHIO**

**MAY 2009**

**(REDACTED 1 PAGE)**

**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY  
FOIA EXEMPT**

**FIGURE A-1**

**Norwood Industries**

**Site Location Map**

See attached Action Memo for Figure A-1

**FIGURE A-2**

**Norwood Industries**

**Site Features Map**

See attached action memo for A-2

## **ATTACHMENT 1**

### **DETAILED CLEANUP CONTRACTOR COST ESTIMATE**

#### **NORWOOD INDUSTRIES SITE Toledo, Lucas County, Ohio MAY 2009**

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Norwood Industries Site are as follows:

Personnel & Equipment	\$46,900.60
Materials	\$4,100
Sampling and Analysis	\$0
Transportation and Disposal	\$70,000
Total	\$121,000.60
Plus 15% Contingency	\$18,150.00
Total ERRS Contractor Costs	\$139,150.60

## ATTACHMENT 2

### U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

#### ADMINISTRATIVE RECORD FOR NORWOOD INDUSTRIES SITE TOLEDO, LUCAS COUNTY, OHIO

ORIGINAL  
SEPTEMBER 10, 2008  
(SDMS ID: 299889)

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	02/23/05	Coleman, J., Toledo Fire Department	Norwood Industries	Letter re: Notice of Unsafe Building for the Structure Located at 1678 Norwood w/Attach- ments <b>(SDMS ID: 29989)</b>	5
2	05/21/08	Sarvis, H., Ohio EPA	Durno, M., U.S. EPA	Letter re: Request for U.S. EPA Assistance in Conducting a Potentially Time-Critical Removal Action at the Norwood Industries Site <b>(SDMS ID: 299891)</b>	2
3	07/11/08	Weston Solutions	U.S. EPA	Site Assessment Report for the Norwood Industries Site <b>(SDMS ID: 299892)</b>	20
4	07/21/08	Gulch, J., U.S. EPA	Weaver, C., Ohio EPA	Letter re: Request for State ARARs for the Norwood Industries Site <b>(SDMS ID: 299893)</b>	1
5	09/09/08	Nachowicz, L., U.S. EPA	Norwood Industries c/o C. Osswald, Registered Agent	Letter re: General Notice of Potential Liability for the Norwood Industries Site <b>(SDMS ID: 299894)</b>	5
6	09/10/08	Gulch, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Time- Critical Removal Action at the Norwood Industries Site <b>(PORTIONS OF THIS DOCUMENT HAVE BEEN RE- DACTED) (SDMS ID: 299888)</b>	29

UPDATE #1  
DECEMBER 23, 2008

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	10/24/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 1 - Initial for the Norwood Industries Site (SDMS ID: 311164)	3
2	11/07/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 2 - Continuation of Removal Action at the Norwood Industries Site (SDMS ID: 313949)	3
3	11/21/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 3 - Continuation of Removal Activities at the Norwood Industries Site (SDMS ID: 315500)	4
4	12/12/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 4 - Continuation of Removal Action at the Norwood Industries Site (SDMS ID: 313423)	3
5	12/23/08	Gulch, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Ceiling In- crease to Complete the Time-Critical Removal Action at the Norwood Industries Site (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED) (SDMS ID: 313422)	51

UPDATE #2  
MAY 15, 2009

1	01/12/09	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 5 - Continuation of Removal Activities at the Norwood Industries Site	3
2	03/03/09	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 6 - Continuation of Removal Activities at the Norwood Industries Site	3

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
3	00/00/00	Guich, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Ceiling Increase to Complete the Time Critical Removal Action at the Norwood Industries Site (PENDING)	



# **ATTACHMENT 3**

## **INDEPENDENT GOVERNMENT COST ESTIMATE**

**NORWOOD INDUSTRIES SITE  
TOLEDO, LUCAS COUNTY, OHIO**

**MAY 2009**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**

**(REDACTED 3 PAGES)**

**ATTACHMENT 4**

**ORIGINAL ACTION MEMORANDUM DATED SEPTEMBER 10, 2008**




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
EMERGENCY RESPONSE BRANCH  
9311 GROH ROAD, ROOM 216  
GROSSE ILE, MI 48138-1697

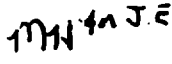
SEP 10 2008

MEMORANDUM

SUBJECT: ACTION MEMORANDUM: Request for a Time-Critical Removal Action at the Norwood Industries Site, Toledo, Lucas County, Ohio (Site ID # B5PA)

FROM: Jon J. Gulch, On-Scene Coordinator   
Emergency Response Branch 1, Section 1

TO: Richard C. Karl, Director  
Superfund Division

THRU: Jason H. El-Zein, Chief   
Emergency Response Branch 1

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$668,902 to conduct a time-critical removal action at the Norwood Industries Site (the Site), which is located at 1678 Norwood Avenue in Toledo, Ohio. The response actions proposed herein are necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. The City of Toledo-Division of Environmental Services (TDES), Ohio Environmental Protection Agency (OEPA) and U.S. EPA have documented the presence of hazardous substances existing at the Site for several years, including flammable substances in drums and other containers inside Site structures, and materials leaking through the walls into the environment.

The owner of the Site, who operates a rubber/Paracril blending business at the Site, but has not had significant operations for several years, is Mr. Charles Osswald (a.k.a. Mr. Charles Oswald). According to Mr. Osswald, operations are currently slow, but that the Site is operational. On several occasions, U.S. EPA has performed surveillance on the property and has not seen operations or activity on Site. TDES routinely performs drive-by inspections and has not seen the presence of operations or activity at the Site. In addition, OEPA believes that there are significant issues with the storage of potentially hazardous materials at the Site. On November 9, 2006, the City of Toledo-Fire Department placed a "Code Red" designation on the Site due to general uncleanness and the potential for a large fire posed by flammable materials. According to February 23, 2005, memorandum from the Toledo Fire Department to the owner of Norwood Industries, "(A) building that is structurally unsound jeopardizes the life and health of the fire personnel responding in the event of an emergency...please be advised that because

of the risks involved and the likelihood of serious injury or death to firefighters, in the event that your building becomes involved in a fire, we will not conduct interior firefighting efforts in your building". The Site and the wastes it contains are secured by a single exterior door and there are multiple windows and secondary entry points that could allow unrestricted public access. There are not daily operations and no Norwood Industries personnel on Site.

The response action proposed herein will mitigate the threats posed by the waste at the Site, by properly identifying, consolidating, packaging, removing and disposing of hazardous substances. Additional Site activities will include security, perimeter air monitoring, and decontamination of the building and surrounding Site property, as needed. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1), to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require approximately 45 working days to complete.

There are no nationally significant or precedent setting issues associated with the Site. The Site is not on the National Priorities List.

## II. SITE CONDITIONS AND BACKGROUND

1. The CERCLIS identification number for this Site is OHN000510295
2. Physical Location and Description of Site

The Site is located at 1678 Norwood Street, Toledo, Lucas County, Ohio 43607. An aerial photograph of the Site and the surrounding area is attached in Figure A-1. The Site consists of a two-story warehouse building, which was built in 1917, with a total of approximately 14,337 square feet under roof, on a lot approximately one acre in size, located in an area that is primarily residential with some commercial and industrial subdivisions. The Site is bounded on the north by an open lot and Oakwood Avenue, to the east by Norfolk Southern railroad tracks and an open lot, to the south by Norwood Avenue and industrial properties, and to the west by Clinton Street and an unnamed tire and automotive service facility (Figure A-2). According to area census data, there are six schools (five with outdoor playgrounds), three churches, and 851 individuals that live within one-quarter (1/4) mile of the Site (Comparative Demographic and Housing Report for Greater Neighborhood Census Tract 24.02 Ohio 43607). According to the Lucas County Local Emergency Planning Committee, there are 3,382 homes within one mile of the Site (Figure A-3).

The geographical coordinates for the Site are 41° 39' 19 north latitude and 83° 35' 0" west longitude. As of June 4, 2008, there were approximately 2,047 55-

gallon drums and other containers of unknown waste in storage throughout the building. However, due to the amount of garbage and debris spread throughout the building, it is anticipated that several more drums and other containers of unknown waste will be encountered during the Removal Action. It is likely that some of the inaccessible, unidentifiable drums and small containers within the warehouse contain hazardous substances. The nearest homes on the west side of the lot are approximately 100 feet from the area in which the leaking drums are currently stored. The Site is not fenced on three sides or otherwise enclosed or protected, and partially secured windows and doors provide temporary restricted access to all areas of the Site.

The Site consists of a warehouse facility that is currently used to store, mix, and repackage various materials, including Paracril (a synthetic nitrile rubber and plasticizer). Mr. Charles Osswald owns the property and performs mixing and repackaging operations within the facility under the Norwood Industries company name. According to Mr. Osswald, Norwood Industries obtains empty drums and containers from a variety of sources and uses them to repackage materials for relocating businesses and other clients. Mr. Osswald also indicated that Norwood Industries stores materials for clients. Mr. Osswald has owned and operated within the facility since 1977 and has accumulated various drums and small containers at the Site. In addition to operations conducted by Norwood Industries, Mr. Osswald also utilizes another warehouse facility in Toledo to store and repackage materials.

The second warehouse facility, located at 4301 Creekside Avenue, Toledo, Lucas County, Ohio, consists of a five-story warehouse facility, one-story outlying building, and five semi-truck trailers used to store various materials. Mr. Osswald leases the second warehouse facility from Mr. Drew Hoffer of Jachs, Inc., and performs storage and repackaging operations under the Cretecote, LLC, company name. It is unknown how long Mr. Osswald has leased and operated within the second warehouse facility. Mr. Osswald has accumulated numerous drums and small containers at the Cretecote Site. Many of the drums and small containers stored at the Norwood Site contain the same materials as those stored at the Cretecote Site. The Cretecote Site is currently the focus of a separate U.S. EPA removal action site assessment; additional information regarding the Cretecote site can be found in the Site Assessment Report for the Cretecote Drum Site (Document Control Number [DCN] 456-2A-ACFF.)

### 3. Site Background

In February 2005, the Toledo Department of Fire and Rescue Operations (TFD) was placed on notice that the building at the Site was structurally unsound. Mr. Osswald, as the registered owner, was to repair the building and notify TFD, at which point a follow-up code inspection would occur to remove the "Code Red" placard. At some point prior to November 9, 2006, the City of Toledo-Fire

Department placed a "Code Red" designation on the Site due to general uncleanliness and the potential for a large fire posed by flammable materials. According to February 23, 2005, memorandum from the Toledo Fire Department to the owner of Norwood Industries, "(A) building that is structurally unsound jeopardizes the life and health of the fire personnel responding in the event of an emergency...please be advised that because of the risks involved and the likelihood of serious injury or death to firefighters, in the event that your building becomes involved in a fire, we will not conduct interior firefighting efforts in your building".

On May 23, 2005, TDES issued a Notice of Violation (NOV) to Mr. Osswald for non-compliance with the Toledo Municipal Code regarding Storm Water Discharge Control and Abatement of Nuisances on the property located at 1678 Norwood in Toledo, Ohio. The NOV specifically notes that TDES "officials witnessed the migration of an unknown waste into nearby storm sewers on the property located at Norwood Industries on Norwood Ave. in Toledo, Ohio...a rain event on Friday, May 20, 2005, resulted in the product migrating to nearby storm sewers on Norwood Ave. and Clinton Road."

On May 8, 2008, OEPA and TES conducted a follow-up inspection at the Site. In the photolog for this inspection OEPA noted that spilled Paracril had been on the floor for 2 years, it has oozed through the walls to the outside, and that Mr. Osswald has been in the process of cleaning-up the spilled material. OEPA asked Mr. Osswald to sample the material to determine if it exhibits hazardous characteristics. In the same general area, it is noted that the condition of drums is very poor and that many had leaked onto the floor.

On May 21, 2008, EPA received a referral letter from OEPA stating that "in the process of investigation, Mr. Osswald has explained to Ohio EPA that his intention was to purchase materials he believed were useful and re-package and/or re-sell them. However, Mr. Osswald has admitted that he has not been successful in finding customers and it appears that material, such as what he has reported to be Paracril, has been at the Norwood facility for possibly 20 years. It started leaking out of drums at least 2 years ago when the roof collapsed and may have been leaking for a longer period of time. The floor was covered with the Paracril and some of it even oozed through the walls to the outside." On May 8, 2008, OEPA investigated the Norwood facility and found 400-500 drums of Paracril, 50 drums of latex resin modified with glycol, and many 5-gallon pails of paint and thinner. OEPA concluded that "there is a high potential for exposure to humans and the environment by the continued potential hazardous waste storage and potential for releases in the Facilities, especially if a fire results from its storage...neighborhood residents may be exposed to hazardous wastes from the stored containers that remain on site." In addition, "Ohio EPA believes the material in the containers could be waste and possibly hazardous waste."

On June 3, 2008, U.S. EPA mobilized its Superfund Technical Assistance and Response Team (START) contractor to the Site to conduct a Site Assessment (SA). During the SA, the presence of approximately 2,047 55-gallon drums and other containers was noted. During its SA, START documented current Site conditions, inventoried all accessible drums and containers, and sampled five selected drums and containers and one solid sample of the Paracril material, which is leaking from drums into the outside environment. Analytical results of these samples indicated that two drums, ND-WL005-060408 and NL-WL006-060408, had flash point results less than 140 deg F. Sampling results identified elevated levels of listed solvents in materials on the floor (Paracril) and in two drums at the Site. Samples ND-WL001-060408, ND-WL002-060408, ND-WS001-060408, and ND-WS001-060408D (duplicate) exhibited reportable concentrations of ethylbenzene, toluene, and/or xylenes.

The amount and haphazard placement of debris and general refuse within the building limited access to all parts of the building. Narrow walkways had been cleared through the assortment of debris, drums, small containers, pallets, and general refuse, but WESTON START was unable to access all areas and unable to identify all drums and small containers. It is likely that some of the inaccessible, unidentifiable drums and small containers within the warehouse facility contain hazardous substances. In addition, WESTON START identified hazardous substances at the Cretecote Site, through separate site assessment activities. Due to the fact that Mr. Osswald performs operations at both warehouse facilities, and some of the same materials were identified at both of the Sites, it is possible that hazardous substances found at the Cretecote Site could also be stored at this Site.

#### 4. Environmental Justice Analysis

According to the U.S. EPA Region 5 Superfund Environmental Justice Analysis, the average percentage of low income residents in Ohio is 30% and the average minority population is 16%. To meet the environmental justice (EJ) criteria, the area within one mile of the Site must have a population that is twice the state low income percentage or twice the state minority percentage. Within one mile of this Site, the percentage of the population that is low income is 59% and the percentage of the population that is minority is 89%. The EJ Analysis is attached to this memo in Attachment III. Therefore, this Site meets the Region's EJ criteria based on demographics, as identified in U.S. EPA Region 5's June 1998 policy document entitled *Interim Guidelines for Identifying and Addressing a Potential EJ Case*.

### III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions present at the Norwood Industries Site present an imminent and substantial threat to the public health, welfare, and the environment, based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances

Pollution Contingency Plan (NCP), as amended, 40 C.F.R. Part 300. These factors include the following:

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:

Results of sampling conducted in conjunction with this site assessment identified ignitable materials in two containers. Pursuant to 40 CFR 261.21 (a)(1), these materials are considered hazardous based on the Resource Conservation and Recovery Act (RCRA) characteristic of ignitability, which states: "a solid waste exhibits the characteristic of ignitability if a representative sample of the waste ... is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume and has flash point less than 60°C (140°F), as determined by the Pensky Martens Closed Cup Tester..." Samples ND-WL005-060408 and ND-WL006-060408 had flash point results less than 140°F. Sampling results identified elevated levels of VOCs in material on the floor and in two drums at the Site. Samples ND-WL001-060408, ND-WL002-060408, ND-WS001-060408, and ND-WS001-060408D (duplicate) exhibited elevated concentrations of ethylbenzene, toluene, and/or xylenes. Although sampling results identified no materials considered to be hazardous based on the RCRA characteristic of corrosivity, START observed drums labeled "corrosive" that were inaccessible at the time of this site assessment.

The volume and haphazard placement of debris and general refuse within the building limited access to all parts of the building. Narrow walkways had been cleared through the assortment of debris, drums, small containers, pallets, and general refuse, but WESTON START was unable to access all areas and unable to identify all drums and small containers. It is possible, based on the results from the June 4, 2008, sampling, that some of the inaccessible, unidentifiable drums and small containers within the warehouse facility contain hazardous substances. In addition, WESTON START identified hazardous substances at the Cretecote Site through separate site assessment activities. Due to the fact that Mr. Osswald claims to perform operations at both warehouse facilities, and some of the same materials were identified at both of the Sites, it is possible that hazardous substances found at the Cretecote Site could also be stored at this Site.

According to area census data, there are six schools (five with outdoor playgrounds) and three churches within one mile of the Site and 851 individuals that live within one-quarter (1/4) mile of the Site (Comparative Demographic and Housing Report for Greater Neighborhood Census Tract 24.02 Ohio 43607). According to the Lucas County local emergency planning committee (LEPC), there are 3,382 homes, one day care, one elementary school, and one park located within a one-mile radius of the Site. Access onto the property is unrestricted in areas, and trespassers entering onto the Site could come in contact with hazardous materials located in drums, small containers, and on the floor. Trespassers could also cause the accidental or intentional release of hazardous materials stored at the



Site. The close proximity of residences and other vulnerable areas immediately surrounding the Site would greatly increase the likelihood of human health and environmental impacts, should a release occur at the Site.

2. Actual or potential contamination of drinking water supplies or sensitive ecosystems:

Although no floor drains were observed within the warehouse facility. It is possible that spilled material within the building could be released into storm sewer catch basins along Clinton Street and Norwood Avenue. Eventually, material that has been released into a storm sewer would migrate to its discharge point at an open water body. The nearest major water body to the Site is the Ottawa River, located approximately two miles northwest of the Site. The Ottawa River flows northeast to the Maumee Bay and Lake Erie.

3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.

As described above, there are numerous drums and small containers located throughout the warehouse facility. Laboratory analytical results identified waste material within the drums and small containers that are considered to be hazardous based on the characteristic of ignitability and contain elevated concentrations of VOCs. Although sampling results identified no materials considered to be hazardous based on the RCRA characteristic of corrosivity, START observed drums labeled "corrosive" that were inaccessible at the time of this site assessment. Several of the drums and small containers were uncovered, deteriorated, and/or leaking. Further deterioration of the drums and small containers may allow additional quantities of hazardous substances to be released and migrate into the environment. The volume and haphazard placement of debris and general refuse within the building limited access. Narrow walkways had been cleared through the assortment of debris, drums, small containers, pallets, and general refuse, but WESTON START was unable to access all areas and unable to identify all drums and small containers. It is likely that some of the inaccessible, unidentifiable drums and small containers within the warehouse facility contain hazardous substances. In addition, WESTON START identified hazardous substances at the Cretecote Site, through separate site assessment activities. Due to the fact that Mr. Osswald claims to perform operations at both warehouse facilities, and some of the same materials were identified at both of the Sites, it is possible that hazardous substances found at the Cretecote Site could also be stored at this Site.

4. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released:

Although the roof was repaired over the portion of the building where the Paracril material has been spilled onto the floor, it is evident that this material is leaking out of the building and onto the soil. Water entering into the warehouse facility from other areas could potentially assist in the migration of this and other spilled material into the outside environment. In addition, the warehouse facility is not heated. Temperatures during winter in Ohio often drop to below freezing. This freeze and thaw can further degrade the conditions of the drums, causing liquids to be released into the environment. Rain and snow could also result in the run-off of contamination into the storm sewer or subsurface soil.

5. Threat of fire or explosion:

Laboratory analytical results identified waste material within the drums and small containers that are considered to be hazardous based on the characteristic of ignitability. In addition, WESTON START documented several drums and small containers labeled "flammable." The quantity of flammable materials in drums and small containers within the warehouse facility greatly increases the threat of fire or explosion at the Site. The owner has indicated that trespassers have accessed the Site and have entered the warehouse and could inadvertently light a match presenting a potential ignition source. Electrical power within the warehouse facility is currently transmitted with extension cords and power strips. Extension cords are laid across the floor, hung from the ceiling, and draped over drums and debris throughout the warehouse facility. This highly dangerous method of electrical transmission throughout the warehouse facility coupled with the volume of flammable liquids and leaking drums stored within the warehouse facility poses a substantial threat of fire or explosion.

According to TDES, the conditions at the Site are unchanged in the past several years and have been verified by routine inspections. In addition, OEPA believes that there are significant issues with the storage of potentially hazardous materials at the Site. On November 9, 2006, the City of Toledo-Fire Department placed a "Code Red" designation on the Site due to general uncleanness and the potential for a large fire posed by flammable materials. According to February 23, 2005 memorandum from the Toledo Fire Department to the owner of Norwood Industries, "(A) building that is structurally unsound jeopardizes the life and health of the fire personnel responding in the event of an emergency...please be advised that because of the risks involved and the likelihood of serious injury or death to firefighters, in the event that your building becomes involved in a fire, we will not conduct interior firefighting efforts in your building". The Site and the wastes it contains are secured by a single exterior door and there are multiple windows and secondary entry points that could allow unrestricted public access.

6. The availability of other appropriate federal or state response mechanisms to respond to the release.

On May 21, 2008, OEPA requested the assistance of the U.S. EPA Region 5 Removal Program to evaluate and mitigate the potential threat posed by the Site. OEPA made this request because it does not have appropriate state response mechanisms to respond.

#### IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

#### V. PROPOSED ACTIONS

1. The OSC proposes to undertake the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:
  - A. Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
  - B. Develop and implement a Site Work Plan and Site Security Plan;
  - C. Inventory and perform hazard characterization, in compliance with a Site-specific Quality Assurance/Quality Control Plan, on all substances in containers, drums and tanks;
  - D. Investigate the potential for soil contamination on Site property;
  - E. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
  - F. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA-approved disposal facility, in accordance with U.S. EPA's Off-Site Rule, 40 C.F.R. § 300.440; and
  - G. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP.

2. Applicable and Relevant and Appropriate Requirements

All applicable and relevant and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable. OSC Gulch sent a letter dated July 21, 2008, to Colleen Weaver, OEPA, Northwest District Office, requesting that he search for any applicable state ARARs. To the extent practicable, U.S. EPA will comply with the ARARs identified in a timely manner.

3. Contribution to Remedial Performance

The threats posed by open and deteriorated drums and containers with substances considered hazardous are actionable under the criteria listed in Section 300.415(b)(2) of the NCP. The response actions proposed herein are consistent with any long-term remedial actions which may be required. Elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to minimize substantial requirements for post-removal Site controls.

4. Off-Site Rule

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

5. Disproportionate Finding

The response actions described in this memorandum directly address the actual or threatened release of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

6. Preservation of Information and Evidence

The removal action will be conducted in a manner to obtain and preserve information and evidence which may be of use in a civil or criminal investigation of the Site. Actions also will be coordinated with OEPA to facilitate an orderly transition to their planned Fiscal Year 2008 remedial activities.

## VI. ESTIMATED COSTS

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 45 on-site working days to complete. More detailed cleanup contractor costs are presented in Attachment 1. The Removal Project Ceiling Estimate is as follows:

### 1. Extramural Costs

Regional Removal Allowance Costs:	\$ 502,428.68
-----------------------------------	---------------

Total Cleanup Contractor Costs (This cost category includes estimates for: Emergency and Rapid Response Services (ERRS) contractor, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 15% contingency.)

### 2. Other Extramural Costs Not Funded from the Regional Allowance:

Total START, including multiplier costs	\$ 54,990.00
---	--------------

Subtotal, Extramural Costs	\$ 557,418.68
----------------------------	---------------

Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	<u>\$ 111,483.74</u>
---	----------------------

3. TOTAL, REMOVAL ACTION PROJECT CEILING	\$ 668,902.42
--	---------------

## VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or no action will result in increased potential of the toxic and hazardous substances to release, thereby threatening the environment and the health and welfare of nearby residents and other persons who are in proximity to the Site.

## VIII. OUTSTANDING POLICY ISSUES

None

## IX. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be:<sup>1</sup>

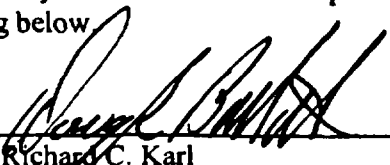
$$(\$668,902 + \$50,580) + (49.59\% \times \$719,482) = \$1,076,273$$

X. RECOMMENDATION

This decision document represents the selected removal action for the Norwood Industries Site located in Toledo, Lucas County, Ohio. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, which is summarized in Attachment II. Conditions at the Site meet the NCP § 300.415(b)(2) criteria for a time-critical removal action and I recommend your approval of the proposed removal action.

The total removal project ceiling, if approved, will be \$668,902. Of this, an estimated \$613,912 may be used for the cleanup contractor costs. You may indicate your decision by signing below

APPROVE:

  
 Richard C. Karl  
 Director, Superfund Division

DATE:

9/10/08

DISAPPROVE:

Richard C. Karl  
 Director, Superfund Division

DATE:

Enforcement Addendum

Figures:

- A-1 Site Location Map
- A-2 Site Features Map
- A-3 Lucas County LEPC Vulnerability Map

Attachments:

- 1. Detailed Cleanup Contractor Cost Estimate
- 2. Administrative Record Index
- 3. Region 5 EJ Analysis
- 4. Independent Government Cost Estimate

<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.

cc: D. Chung, U.S. EPA HQ, 5203-G  
M. Chezik, U.S. DOI, w/o Enf. Addendum  
Chris Korleski, Director, OEPA, w/o Enf. Addendum  
Marc Dann, Ohio Department of Attorney General, w/o Enf. Addendum

BCC PAGE

(REDACTED 1 PAGE)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION



**ENFORCEMENT ADDENDUM**

**NORWOOD INDUSTRIES - NORWOOD AVENUE SITE  
TOLEDO, LUCAS COUNTY, OHIO**

**SEPTEMBER 2008**

**(REDACTED 1 PAGE)**

**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY  
FOIA EXEMPT**

**FIGURE A-1**

**Norwood Industries**

**Site Location Map**

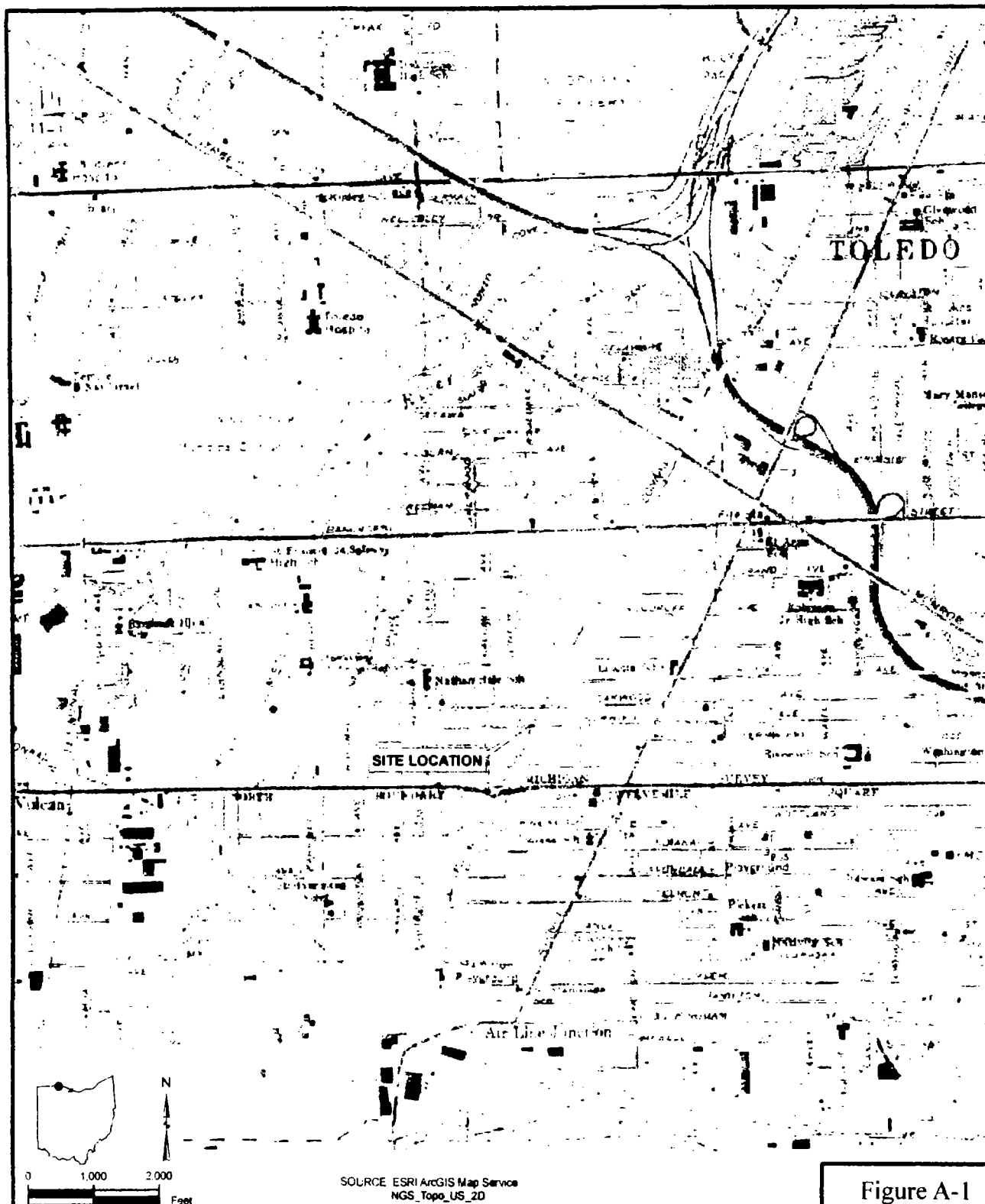
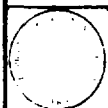


Figure A-1



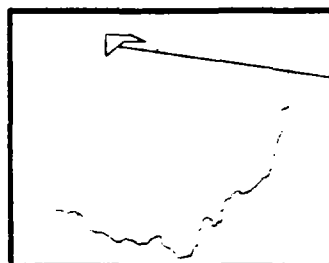
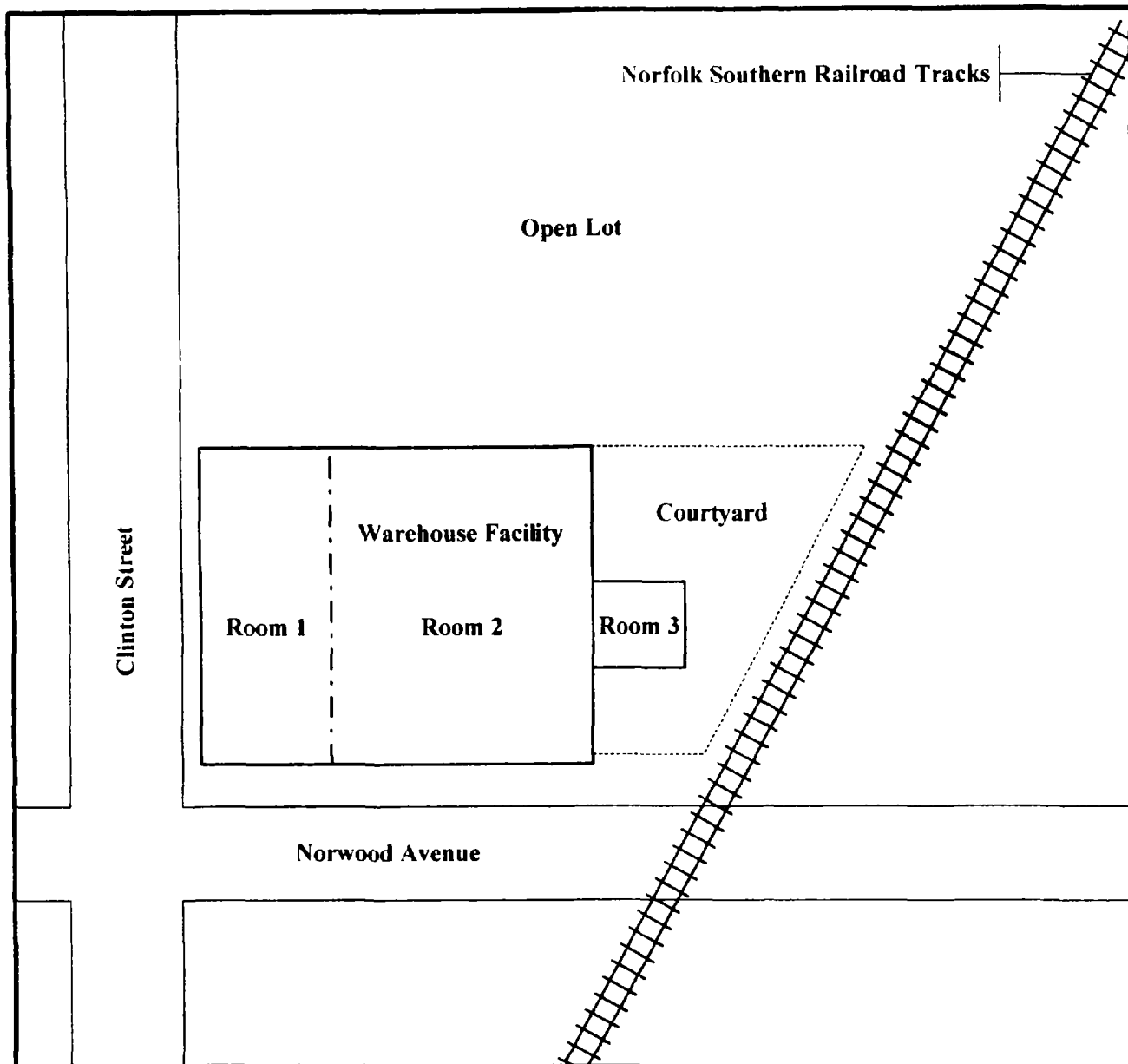
Prepared for:  
**U.S. EPA REGION V**  
 Contract No: EP-S5-06-04  
 TDD No.: S05-0001-0805-015  
 DCN: DCN 454-2A-ACFE



Prepared by:  
**WESTON SOLUTIONS, INC.**  
 7800 W. Outer Drive, Suite 200  
 Detroit, MI 48235

**Site Location Map**  
 Norwood Drum Site  
 1678 Norwood Ave  
 Toledo, Ohio 43607  
 June, 2008

**FIGURE A-2**  
**Norwood Industries**  
**Site Features Map**



Lucas County

Legend	
	- Structure
	- Fence
	- Interior Wall
	- Railroad Tracks

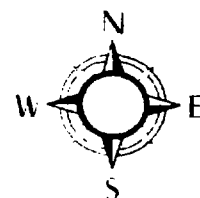
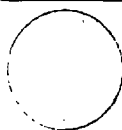


Figure A-2



Prepared for:  
**U.S. EPA REGION V**  
Contract No: EP-S5-06-04

TDD No: S05-0001-0805-015  
DCN: 454-2A-ACFE



Prepared by:  
**WESTON SOLUTIONS, INC.**  
6779 Engle Road, Suite I  
Middleburg Heights, OH 44130

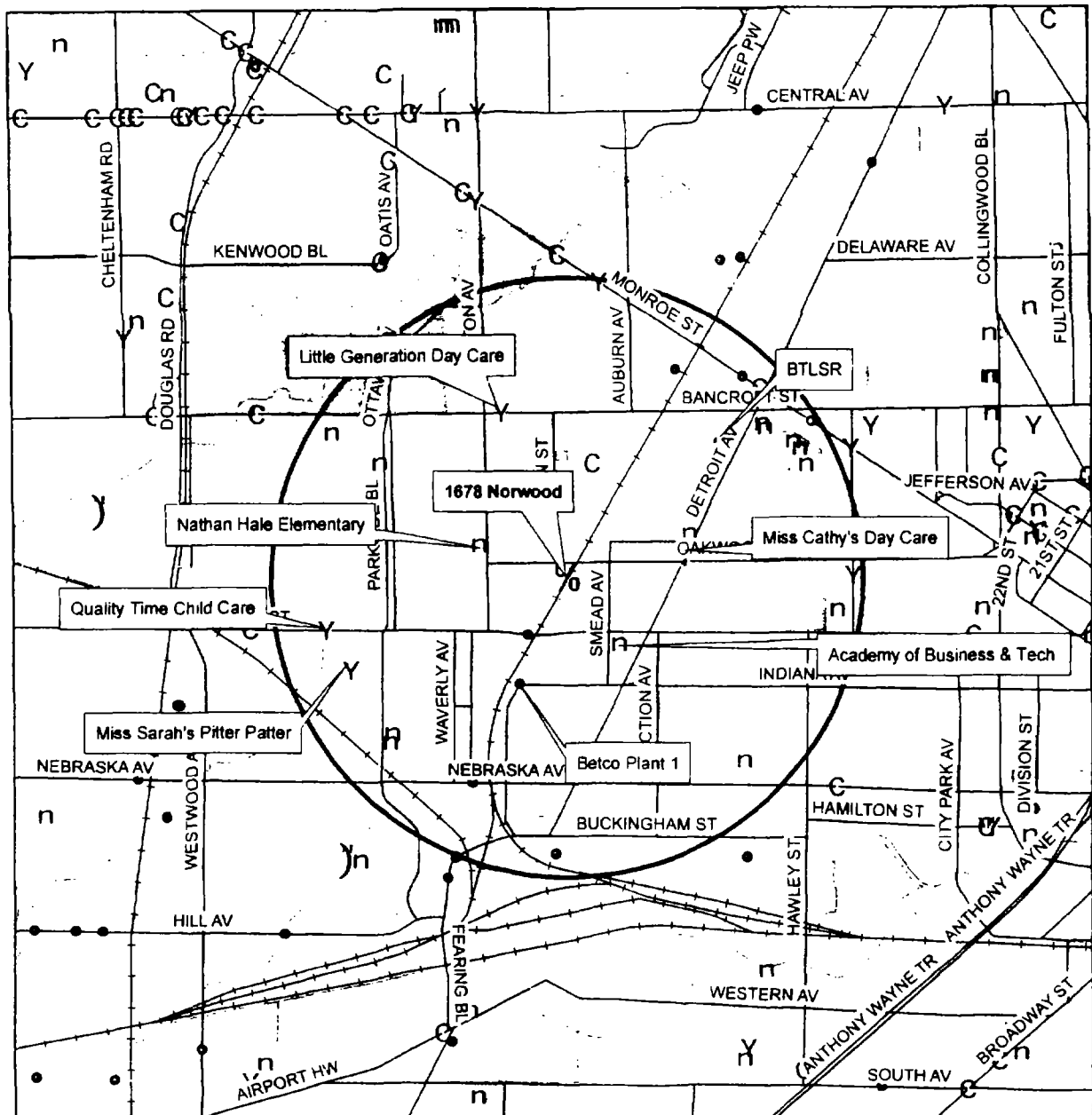
Site Features Map  
Norwood Drum Site Assessment  
Toledo, Lucas County, Ohio  
June, 2008  
Scale: Not to Scale

**FIGURE A-3**

**Norwood Industries**

**Lucas County LEPC Vulnerability Map**

# 1678 Norwood



## Facility Information :

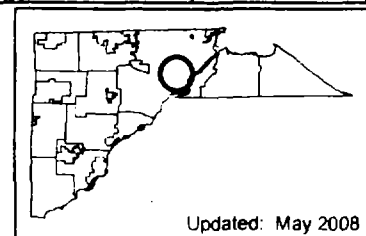
Norwood Industries  
1678 Norwood Ave  
Toledo, OH 43607

## Vulnerability Zone:

VZ : 1.0 Mile displayed on map\*

## Vulnerable Area Description :

Population Affected : 3382 Homes  
Special Populations : Miss Cathy's, Nathan Hale  
Environmental : Ottawa Park  
Transportation : Norfolk Southern Railroad  
Additional Risk Facilities : Betco Plant 1, BTL SR



Updated: May 2008

\* Vulnerability zones determined by ALOHA for worst case scenarios

**ATTACHMENT 1**  
**DETAILED CLEANUP CONTRACTOR COST ESTIMATE**

**NORWOOD INDUSTRIES SITE**  
**Toledo, Lucas County, Ohio**  
**August 2008**

**The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Norwood Industries Site are as follows:**

<b>Personnel &amp; Equipment</b>	<b>\$168,432.50</b>
<b>Materials</b>	<b>\$100,212</b>
<b>Sampling and Analysis</b>	<b>\$10,000</b>
<b>Transportation and Disposal</b>	<b>\$158,250</b>
<b>Total</b>	<b>\$436,894.50</b>
<b>Plus 15% Contingency</b>	<b>\$65,534.18</b>
<b>Total ERRS Contractor Costs</b>	<b>\$502,428.68</b>





## ATTACHMENT 2

### U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

#### ADMINISTRATIVE RECORD FOR NORWOOD INDUSTRIES SITE TOLEDO, LUCAS COUNTY, OHIO

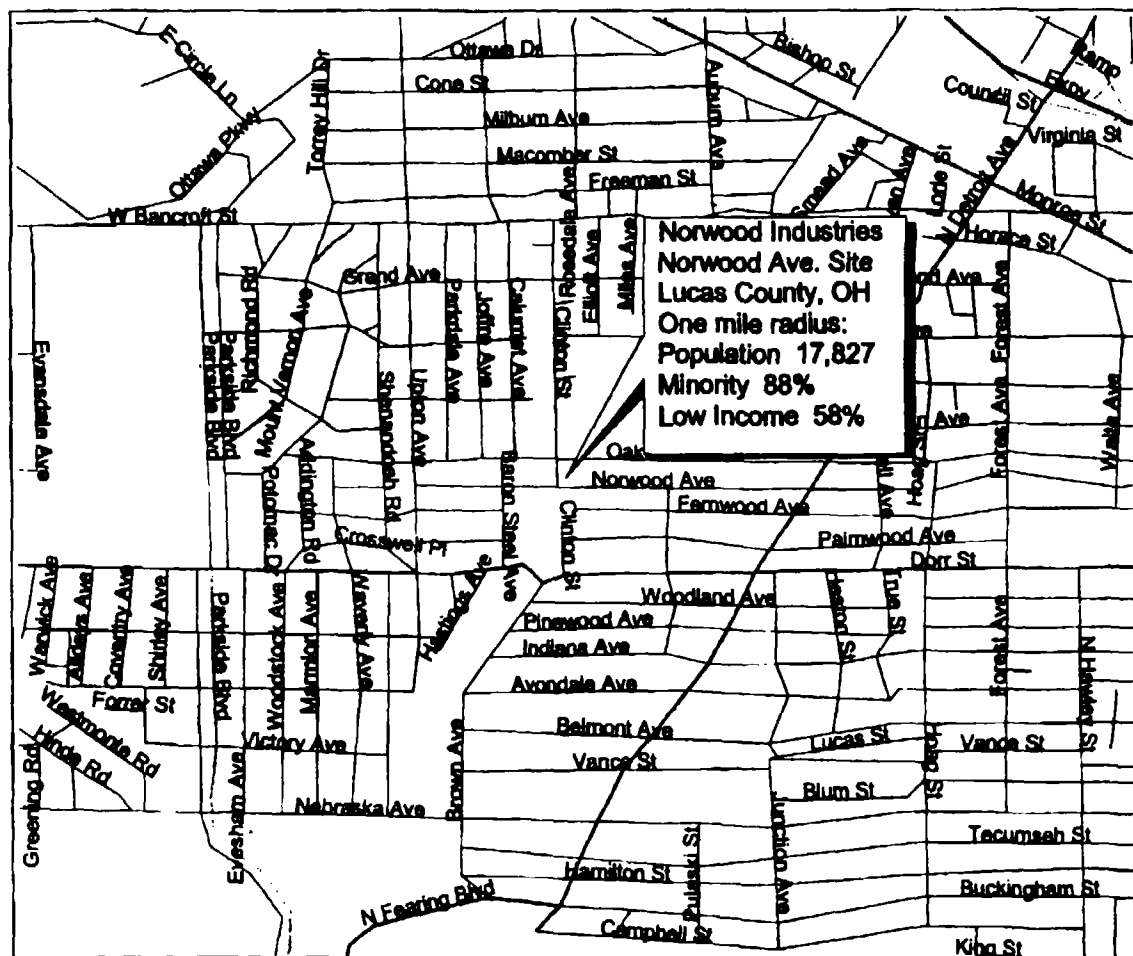
AUGUST 13, 2008

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	02/23/05	Coleman, J., Toledo Fire Department	Norwood Industries	Letter re: Notice of Unsafe Building for the Structure Located at 1678 Norwood w/ Attach- ments	5
2	05/21/08	Sarvis, H., Ohio EPA	Durno, M., U.S. EPA	Letter re: Request for U.S. EPA Assistance in Conducting a Potentially Time-Critical Removal Action at the Norwood Industries Site	2
3	07/11/08	Weston Solutions	U.S. EPA	Site Assessment Report for the Norwood Industries Site	20
4	07/21/08	Gulch, J., U.S. EPA	Weaver, C., Ohio EPA	Letter re: Request for State ARARs for the Norwood Industries Site	1
5	08/00/08	Nachowicz, L., U.S. EPA	Norwood Industries c/o C. Osswald	Letter re: General Notice of Potential Liability for the Norwood Industries Site ( <b>PENDING</b> )	
6	00/00/00	Gulch, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Time- Critical Removal Action at the Norwood Industries Site ( <b>PENDING</b> )	

**ATTACHMENT 3**  
**REGION 5 ENVIRONMENTAL JUSTICE ANALYSIS**

# Region 5 Superfund EJ Analysis

## Norwood Industries-Norwood Ave.Site Toledo,OH



State of Ohio averages:  
Minority: 16%  
Low Income: 30%

U.S. EPA Region 5  
Environmental Justice Case Criteria  
for State of Ohio

Minority: 32% or greater  
Low Income: 60% or greater

0 0.5 1 1.5 2 Miles



Date of Map: 7/28/08

Source of Map: Census 2000 Database/  
ArcView 3.0

**ATTACHMENT 4**

**INDEPENDENT GOVERNMENT COST ESTIMATE**

**NORWOOD INDUSTRIES SITE  
TOLEDO, LUCAS COUNTY, OHIO**

**AUGUST 2008**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**

**(REDACTED 4 PAGES)**

**ATTACHMENT 5**

**CEILING INCREASE ACTION MEMORANDUM DATED DECEMBER 30, 2008**



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5**

**9311 GROH ROAD**

**GROSSE ILE, MI 48138**

DEC 22 2008

**MEMORANDUM**

**SUBJECT:** ACTION MEMORANDUM: Request for a Ceiling Increase to Complete the Time-Critical Removal Action at the Norwood Industries Site, Toledo, Lucas County, Ohio (Site ID #B5PA)

**FROM:** Jon J. Gulch, On-Scene Coordinator  
Emergency Response Branch 1 *JG* 12/22/08

**TO:** Richard C. Karl, Director  
Superfund Division

**THRU:** Jason H. El-Zein, Chief  
Emergency Response Branch 1 *JG* for JHE 12/22/08

**I. PURPOSE**

The purpose of this memorandum is to request and document your approval to increase the project ceiling in order to complete the on-going time-critical removal action. The ceiling increase is necessary to continue mitigation of threats to public health, welfare and the environment posed by the presence of uncontrolled hazardous wastes at the Norwood Industries Site (Site). The proposed project ceiling increase of \$314,296, combined with the previously approved project ceiling of \$668,902, would bring the total allowable project funding expenditure to \$983,198.

The response actions proposed herein are necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. The City of Toledo-Division of Environmental Services (TDES) and Ohio Environmental Protection Agency (OEPA) have documented the presence of unknown substances existing at the Site for several years. U.S. EPA site assessment activities identified flammable substances in drums and other containers inside Site structures, and materials leaking through the walls into the environment.

The response action proposed herein will mitigate the threats posed by the waste at the Site, by properly identifying, consolidating, packaging, removing and disposing of hazardous substances. Additional Site activities will include security, perimeter air monitoring, and decontamination of the building and surrounding Site property, as needed. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1), to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require an additional 45 working days to complete, for a total of 90 working days for the project.

The presence of hazardous substances at the Site has been documented, via field hazard categorization (HazCAT), and includes: flammable liquids; corrosive liquids and solids, including several drums of organic acids; halogenated organic liquids; and oxidizing liquids and solids. Since beginning the time-critical removal action, hazardous wastes have been identified in 188 drums and 272 small containers. In addition, several thousand small containers have been located in areas that had been previously inaccessible due to haphazard placement of drums, pallets and small containers, mixed with general debris. This includes the basement, which contains hundreds of 5-gallon buckets and 1-gallon containers, an elevator shaft with approximately 8,000 gallons of liquid, and 2 inches of an unknown sludge covering approximately 75% of the floor.

There are no nationally significant or precedent setting issues associated with the Site. The Site is not on the National Priorities List.

## **II. SITE CONDITIONS AND BACKGROUND**

1. The CERCLIS identification number for this Site is OHN 000 510 295
2. Physical Location and Description of Site

The Site is located at 1678 Norwood Street, Toledo, Lucas County, Ohio, 43607. An aerial photograph of the Site and the surrounding area is attached in Figure A-1. The Site consists of a two-story warehouse building, which was built in 1917, with a total of approximately 14,337 square feet under roof, on a lot approximately one acre in size, located in an area that is primarily residential with some commercial and industrial subdivisions. The Site is bounded on the north by an open lot and Oakwood Avenue, to the east by Norfolk Southern railroad tracks and an open lot, to the south by Norwood Avenue and industrial properties, and to the west by Clinton Street and an unnamed tire and automotive service facility (Figure A-2)

The geographical coordinates for the Site are 41° 39' 19 north latitude and 83° 35' 0" west longitude. As of June 4, 2008, there were approximately 2,047 55-gallon drums and other containers of unknown waste in storage throughout the building. However, due to the amount of garbage and debris spread throughout the building, it is anticipated that several hundred additional drums and other containers of unknown waste will be encountered during the removal action. It is likely that some of the inaccessible, unidentifiable drums and small containers within the warehouse contain hazardous substances. The nearest homes on the west side of the lot are approximately 100 feet from the area in which the leaking drums are currently stored. The Site is not fenced on three sides or otherwise enclosed or protected, and partially secured windows and doors provide temporary restricted access to all areas of the Site.

For a more detailed description of Physical Location and Description of Site, refer to the original Action Memorandum, dated September 10, 2008 (Attachment 4).

### 3. Site Background

On June 3, 2008, U.S. EPA mobilized its Superfund Technical Assistance and Response Team (START) contractor to the Site to conduct a Site Assessment (SA). During the SA, the presence of approximately 2,047 55-gallon drums and other containers was noted. During its SA, START documented current Site conditions, inventoried all accessible drums and containers, and sampled five selected drums and containers and one solid sample of the Paracril material, which is leaking from drums into the outside environment. Analytical results of these samples indicated that two drums, ND-WL005-060408 and NL-WL006-060408, had flash point results less than 140 deg F. Sampling results identified elevated levels of listed solvents in materials on the floor (Paracril) and in two drums at the Site. Samples ND-WL001-060408, ND-WL002-060408, ND-WS001-060408, and ND-WS001-060408D (duplicate) exhibited reportable concentrations of ethylbenzene, toluene, and/or xylenes.

The amount and haphazard placement of debris and general refuse within the building limited access to all parts of the building. Narrow walkways had been cleared through the assortment of debris, drums, small containers, pallets, and general refuse, but WESTON START was unable to access all areas and unable to identify all drums and small containers. It is likely that some of the inaccessible, unidentifiable drums and small containers within the warehouse facility contain hazardous substances. In addition, WESTON START identified hazardous substances at the Cretecote Site, through separate SA activities. Due to the fact that the business owner performs operations at both warehouse facilities, and some of the same materials were identified at both of the Sites, it is



possible that hazardous substances found at the Cretecote Site could also be stored at this Site.

For a more detailed Site Background, refer to the original Action Memorandum, dated September 10, 2008, attached.

**4. Removal Actions to Date**

On October 16, 2008, U.S. EPA, START, and Emergency and Rapid Removal Service (ERRS) contractors mobilized to the Site and met with the property owner to perform a walk-through of the interior and exterior of the warehouse facility. Specifically, the following activities were started or have been completed:

- A. Implemented the Site Health and Safety Plan, Work Plan and Emergency Contingency Plan;
- B. Established a Command Post and Work Zones;
- C. Identified, inventoried, staged and characterized approximately 972 total items (drums and small containers);
- D. Initiated HazCAT process and have tested approximately 188 55-gallon drums and 272 small containers;
- E. Placed approximately 151 1-gallon pails into 44 55-gallon drums;
- F. Disposed of 36 pallets of solid materials (silica sand and powders) to make room for proper sampling and characterization of hazardous materials; and
- G. Staged several dozen large pieces of metal in the courtyard to allow room in the building for proper sampling and characterization of hazardous materials.

**5. Justification for the Project Ceiling Increase**

- A. Due to the inaccessibility of a vast majority of the building during the Site Assessment, there have been several hundred additional small containers with a wide variety of hazardous constituents, including: flammable liquids; corrosive liquids and solids, including several drums of organic acids; halogenated organic liquids; and oxidizing liquids and solids.
- B. Due to the placement of general debris in the area of the stairway to the basement, access was not possible during the SA. In addition, the owner of the Site indicated that there were no hazardous materials and only "a couple" 5-gallon pails in the

basement. During the week of November 24, 2008, the general debris was cleared from the stairway and access was established to the basement. During the initial entry, it was noted that there were several hundred small containers, several dozen drums, an elevator shaft with approximately 8,000 gallons of liquid and, 2 inches of an unknown sludge covering approximately 75% of the floor.

- C. To access the drums, small containers, elevator shaft water, unknown sludge, and contaminated general debris in the basement, a structural engineer will need to be added to the project team to design a method of removal.
- D. Additional personnel, personnel time, per diem and lodging, and materials will be required to complete the time-critical removal action, which will increase the required project ceiling.

### **III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

The conditions present at the Norwood Industries Site present an imminent and substantial threat to the public health, welfare, and the environment, based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 C.F.R. Part 300. These factors include the following:

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:
2. Actual or potential contamination of drinking water supplies or sensitive ecosystems:
3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.
4. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released:
5. Threat of fire or explosion:
6. The availability of other appropriate federal or state response mechanisms to respond to the release.

Please refer to the original Action Memorandum dated September 10, 2008 (Attachment 4), for detailed threat information. Public health and environmental threats, as well as contaminants of concern remain the same, only the volumes of wastes have increased.

#### **IV. ENDANGERMENT DETERMINATION**

Given the Site conditions, the nature of the known and suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

#### **V. PROPOSED ACTIONS**

1. The OSC has undertaken and will continue to take the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:
  - A. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
  - B. Develop and implement a Site Work Plan and Site Security Plan;
  - C. Inventory and perform hazard characterization, in compliance with a Site-specific Quality Assurance/Quality Control Plan, on all substances in containers, drums and tanks;
  - D. Investigate the potential for soil contamination on Site property;
  - E. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
  - F. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA-approved disposal facility, in accordance with U.S. EPA's Off-Site Rule, 40 C.F.R. § 300.440; and
  - G. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.
2. The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP.

The threats posed by open and deteriorated drums and containers with substances considered hazardous are actionable under the criteria listed

in Section 300.415(b)(2) of the NCP. The response actions proposed herein are consistent with any long-term remedial actions which may be required. Elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to minimize substantial requirements for post-removal Site controls.

## **VI. ESTIMATED COSTS**

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 90 on-site working days to complete. More detailed cleanup contractor costs are presented in Attachment 1. The Removal Project Ceiling Estimate is as follows:

### **REMOVAL PROJECT CEILING ESTIMATE**

<i>Regional Removal Allowance Costs:</i>	<i>Current:</i>	<i>Increase:</i>	<i>Total:</i>
<b>Total Cleanup Contractor Costs:</b> (This cost category includes estimates for ERRS and subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 15% contingency.)	\$502,429	\$206,924	\$709,353
<b><i>Other Extramural Costs Not Funded from the Regional Allowance:</i></b>			
<b>Total START, including multiplier costs:</b>	\$54,990	\$54,990	\$109,980
<b>Extramural Subtotal:</b>	\$557,419	\$261,914	\$819,333
<b>Extramural Contingency (20%)</b>	\$111,484	\$52,382	\$163,866
<b>TOTAL REMOVAL PROJECT CEILING:</b>	\$668,902	\$314,296	\$983,198

### **Applicable or Relevant and Appropriate Requirements**

All applicable and relevant and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable. OSC Gulch sent a letter dated July 21, 2008, to Colleen Weaver, OEPA, Northwest District Office, requesting that he search for any applicable state ARARs. To the extent practicable, U.S. EPA will comply with the ARARs identified in a timely manner. In addition, all wastes will be disposed at a RCRA/CERCLA-approved disposal facility, in accordance with U.S. EPA's Off-Site Rule, 40 C.F.R. § 300.440.

**VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Delayed or no action will result in increased potential of the toxic and hazardous substances to release, thereby threatening the environment and the health and welfare of nearby residents and other persons who are in proximity to the Site.

**VIII. OUTSTANDING POLICY ISSUES**

None

**IX. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,684,128.<sup>1</sup>

$$(\$983,198 + \$50,580) + (62.91\% \times \$1,033,778) = \$1,684,128$$

**X. RECOMMENDATION**

This decision document represents the selected removal action for the Norwood Industries Site located in Toledo, Lucas County, Ohio. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, which is summarized in Attachment II. Conditions at the Site continue to meet the NCP § 300.415(b)(2) criteria for a time-critical removal action and I recommend your approval of the proposed ceiling increase of \$314,296, of this an estimated \$259,306 may be used for the cleanup contractor costs. The total removal project ceiling, if approved, will be \$983,198. You may indicate your decision by signing below.

---

<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.

APPROVE: \_\_\_\_\_

Richard C. Karl  
Director, Superfund Division

DATE: 12-23-08

DISAPPROVE: \_\_\_\_\_

Richard C. Karl  
Director, Superfund Division

DATE: \_\_\_\_\_

#### Enforcement Addendum

#### Figures:

- A-1 Site Location Map
- A-2 Site Features Map

#### Attachments:

1. Detailed Cleanup Contractor Cost Estimate
2. Administrative Record Index
3. Independent Government Cost Estimate
4. Original Action Memorandum dated September 10, 2008

cc: David Chung, U.S. EPA HQ, 5203-G  
Michael Chezik, U.S. DOI, **w/o Enf. Addendum**  
Kevin Clouse, OEPA, **w/o Enf. Addendum**  
OEPA-Central District Office  
Lazarus Government Center  
P.O. Box 1049  
Columbus, OH 43216-1049  
Nancy Rogers, Ohio Department of Attorney General, **w/o Enf. Addendum**  
30 E. Broad Street, 17th Floor  
Columbus, OH 43215-3428

**ENFORCEMENT ADDENDUM**

**NORWOOD INDUSTRIES SITE  
TOLEDO, LUCAS COUNTY, OHIO**

**DECEMBER 2008**

**(REDACTED 2 PAGES)**

**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY  
FOIA EXEMPT**

**FIGURE A-1**  
**Norwood Industries**  
**Site Location Map**



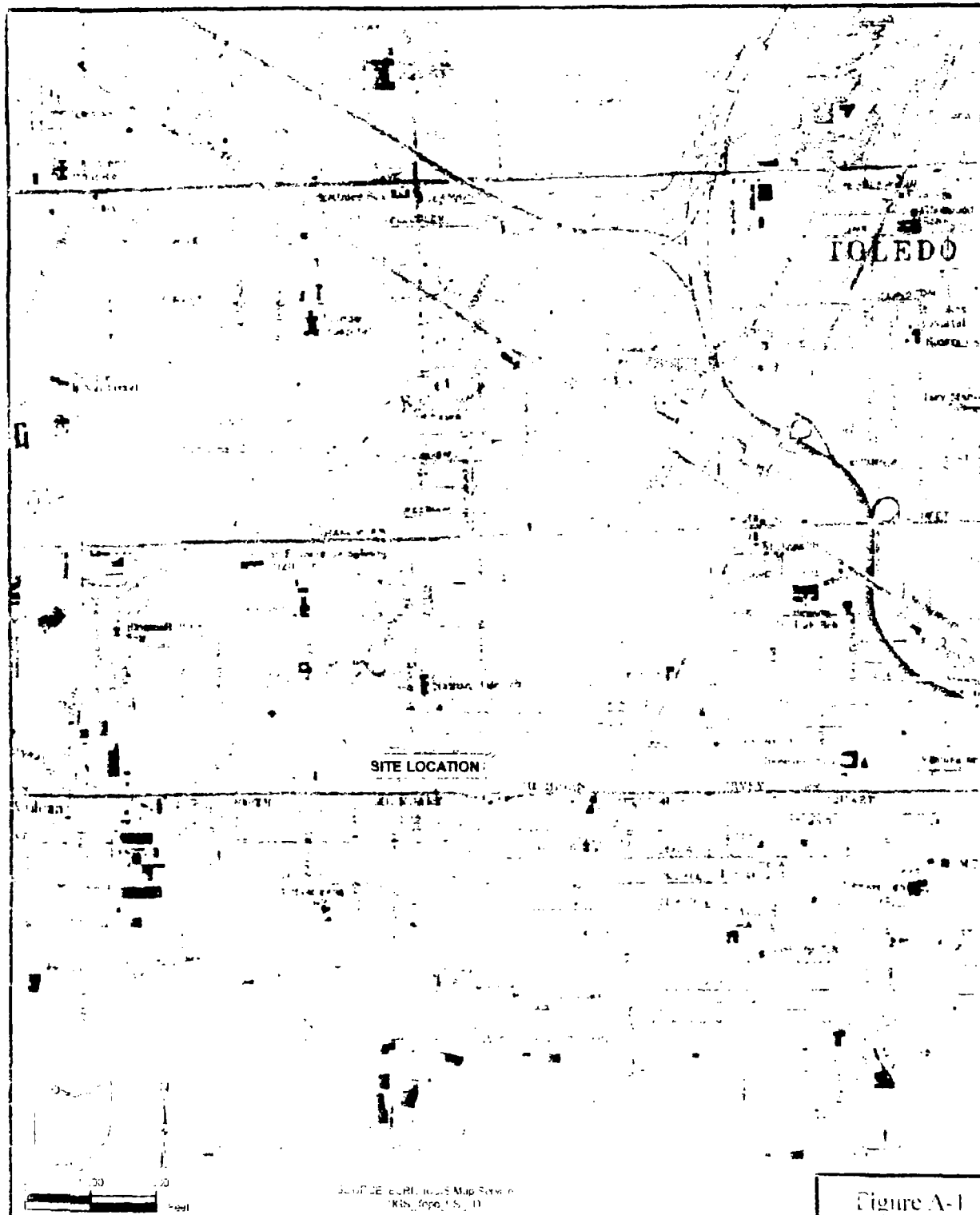


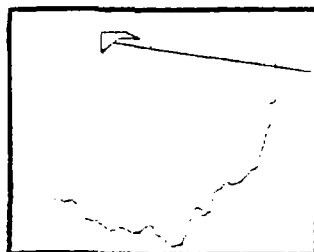
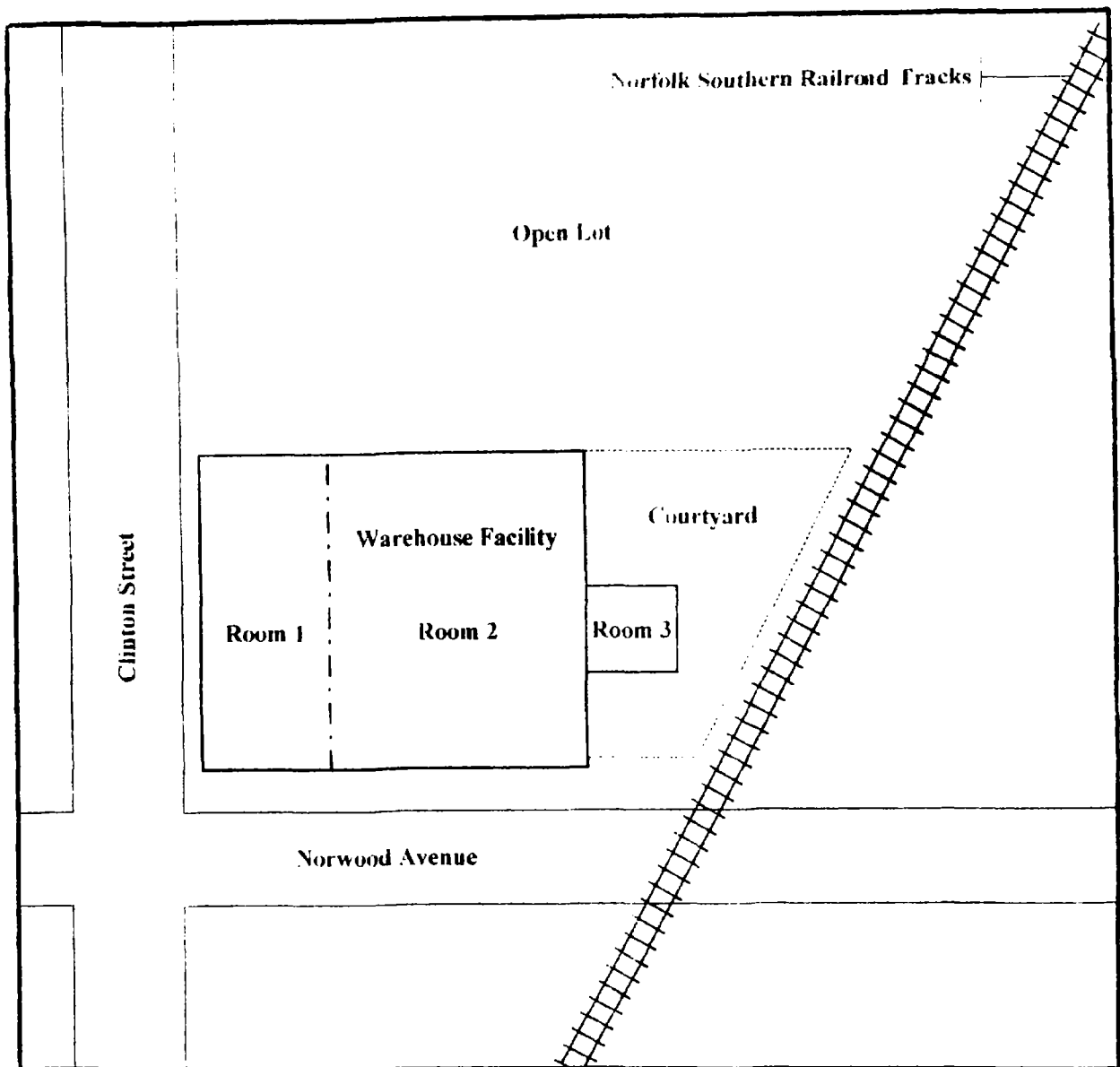
Figure A-1

<p>Prepared for:  <b>U.S. EPA REGION V</b>          Contract No: EP-S5-06-04          TDD No.: S05-00011-0805-015          DCN: DCN-434-2A-ACFE</p>	<p>WESTON SOLUTIONS, INC.          7300 W. Outer Drive          Detroit, MI 48202</p>	<p>Site Location Map          Norwood Drum Site          678 Norwood Ave          Toledo, Ohio 43607          Date: 2008</p>
---	---	--

**FIGURE A-2**

**Norwood Industries**

**Site Features Map**



Lucas County

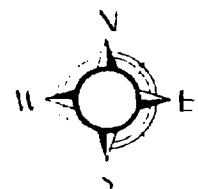
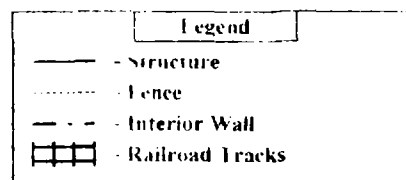



Figure A-2

 <p>Prepared for: <b>U.S. EPA REGION V</b> Contract No: EP-S5-06-04</p> <p>TDD No: S05-0001-0805-015 DCN: 454-2A-ACFE</p>	<p><b>WESTON</b> SOLUTIONS, INC.</p> <p>Prepared by: <b>WESTON SOLUTIONS, INC.</b> 6779 Engle Road, Suite 1 Middleburg Heights, OH 44130</p>	<p>Site Features Map Norwood Drum Site Assessment Toledo, Lucas County, Ohio June, 2008 Scale: Not to Scale</p>
--	--	---

## **ATTACHMENT 1**

### **DETAILED CLEANUP CONTRACTOR COST ESTIMATE**

#### **NORWOOD INDUSTRIES SITE Toledo, Lucas County, Ohio December 2008**

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Norwood Industries Site are as follows:

Personnel & Equipment	\$141,734
Materials	\$14,400
Sampling and Analysis	\$2,000
Transportation and Disposal	\$21,800
Total	\$179,934
Plus 15% Contingency	\$26,990
Total ERRS Contractor Costs	\$206,924

## ATTACHMENT 2

### U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

#### ADMINISTRATIVE RECORD FOR NORWOOD INDUSTRIES SITE TOLEDO, LUCAS COUNTY, OHIO

ORIGINAL  
SEPTEMBER 10, 2008  
(SDMS ID: 299889)

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	02/23/05	Coleman, J., Toledo Fire Department	Norwood Industries	Letter re: Notice of Unsafe Building for the Structure Located at 1678 Norwood w/Attach- ments (SDMS ID: 299889)	5
2	05/21/08	Sarvis, H., Ohio EPA	Durno, M., U.S. EPA	Letter re: Request for U.S. EPA Assistance in Conducting a Potentially Time-Critical Removal Action at the Norwood Industries Site (SDMS ID: 299891)	2
3	07/11/08	Weston Solutions	U.S. EPA	Site Assessment Report for the Norwood Industries Site (SDMS ID: 299892)	20
4	07/21/08	Gulch, J., U.S. EPA	Weaver, C., Ohio EPA	Letter re: Request for State ARARs for the Norwood Industries Site (SDMS ID: 299893)	1
5	09/09/08	Nachowicz, L., U.S. EPA	Norwood Industries c/o C. Osswald, Registered Agent	Letter re: General Notice of Potential Liability for the Norwood Industries Site (SDMS ID: 299894)	5
6	09/10/08	Gulch, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Time- Critical Removal Action at the Norwood Industries Site (PORTIONS OF THIS DOCUMENT HAVE BEEN RE- DACTED) (SDMS ID: 299888)	29

UPDATE #1  
DECEMBER 17, 2008

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	10/24/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 1 - Initial for the Norwood Industries Site (SDMS ID: 311164)	3
2	11/07/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 2 - Continuation of Removal Action at the Norwood Industries Site (SDMS ID: 313949)	3
3	11/21/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 3 - Continuation of Removal Activities at the Norwood Industries Site (SDMS ID: 315500)	4
4	12/12/08	Gulch, J., U.S. EPA	Distribution List	Pollution Report (POLREP) No. 4 - Continuation of Removal Action at the Norwood Industries Site	3
5	00/00/00	Gulch, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Ceiling In- crease to Complete the Time-Critical Removal Action at the Norwood Industries Site (PENDING)	

**ATTACHMENT 3**

**INDEPENDENT GOVERNMENT COST ESTIMATE**

**NORWOOD INDUSTRIES SITE  
TOLEDO, LUCAS COUNTY, OHIO**

**DECEMBER 2008**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**

**(REDACTED 3 PAGES)**